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Barclays Bank Delaware*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHELLE H. PRO,

Plaintiff,

vs.

BARCLAYS BANK, DELAWARE;
EQUIFAX INFORMATION SERVICES,
LLC; FIRST PREMIER BANK;
TRANSUNION, LLC,

Defendants.

Case No.: 2:18-cv-01454-MMD-GWF

**STIPULATION AND
ORDER TO EXTEND DEFENDANT
BARCLAYS BANK DELAWARE'S
TIME TO RESPOND TO COMPLAINT**

(SECOND REQUEST)

This Stipulation to Extend Time to Respond to Complaint is made by and between Plaintiff Michelle H. Pro ("Plaintiff") and Defendant Barclays Bank Delaware ("Barclays") through their respective counsel, in light of the following facts:

RECITALS

- A. Plaintiff filed the Complaint ("Complaint") against Barclays on or about August 7, 2017.
- B. Barclays was served with the Complaint on August 13, 2018.
- C. A Stipulation and Order was granted for Barclays' to Answer Complaint from September 4, 2018 to October 2, 2018.
- D. Barclays' current deadline to respond is October 2, 2018.
- E. The parties agreed to extend Barclays' time to respond to the Complaint through October 22, 2018, in order to give Barclays time to continue to investigate Plaintiff's claims

1 and prepare a proper response, and for the parties to discuss a potential resolution of this
2 matter.

3 F. There is good cause to grant this stipulation because Barclays requires additional
4 time to investigate Plaintiff's claims and prepare a proper response, and the parties require
5 additional time to consider a resolution of this matter.

6 G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays
7 respectfully request that the Court extend Barclays' time to respond to Plaintiff's Complaint
8 through October 22, 2018.

9 **STIPULATION**

10 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays
11 has up to and including October 22, 2018, to file a response to Plaintiff's Complaint.

12 **IT IS SO STIPULATED**

13 DATED: September 21, 2018

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

15 By: /s/ Erik Foley
J Christopher Jorgensen
Erik Foley
Attorneys for Defendant
Barclays Bank Delaware

19 DATED: September 21, 2018

HAINES & KRIEGER, LLC

21 By: /s/ David Krieger
David H. Krieger
Attorney for Plaintiff
Michelle H. Pro

24 **ORDER**

25 **IT IS SO ORDERED**

26 

27 UNITED STATES MAGISTRATE JUDGE

28 DATED 9-24-2018